

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

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| UNITED STATES OF AMERICA, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Case No. CR-22-009-JD |
| |) | |
| JILL NICOLE FORD, |) | |
| |) | |
| Defendant. |) | |

**UNOPPOSED MOTION FOR RELIEF FROM CERTAIN CONDITIONS OF
PRETRIAL RELEASE**

COMES NOW, Jill Nicole Ford, Defendant in the above styled and numbered cause, by and through her counsel of record, J. Patrick Quillian, Esq. (“Counsel”), hereby moves the Court for an order requiring U.S. Probation to temporarily return Mrs. Ford’s passport to her, allowing Mrs. Ford to renew said passport, and permitting her to travel to Cancun, Mexico in November 2022 so that she may attend a conference for work purposes. Mrs. Ford submits the following in support of the motion:

1. Mrs. Ford entered a guilty plea on January 20, 2022, and was permitted to remain on release pending sentencing. Doc. No. 5. That same day Mrs. Ford surrendered her now-expired passport to U.S. Probation as a condition of her release. Doc. No. 12. The conditions of release also prohibit Mrs. Ford from traveling outside the Western District of Oklahoma without U.S. Probation’s

permission and prohibit her from obtaining another passport or other international travel document. *Id.*

2. Mrs. Ford currently resides in Arlington, Texas with her husband and three (3) young children and is being supervised by the U.S. Probation Office of the Northern District of Texas. To date, Mrs. Ford has been fully compliant with her conditions of release.
3. As of the date of this motion, the initial presentence report has not been prepared and no sentencing date has been set.
4. Mrs. Ford has agreed to a restitution amount that exceeds \$250,000 as part of her plea agreement with the government. Doc. No. 8, p. 4. Since beginning pre-indictment talks with the government for resolving this matter, Mrs. Ford has worked to support her family as well as pay off the restitution that will ultimately be ordered by the Court. Mrs. Ford currently works in the Bitcoin mining industry for Monbanc Corporation as a salaried employee who also makes significant commissions by traveling to conferences and soliciting clients for the company. These conferences have historically been lucrative for Mrs. Ford, and those commissions have become even more important for the Ford family since Mrs. Ford's husband has recently become unable to work due to health reasons.
5. Mrs. Ford's employer recently indicated that they wish for her to attend the World Digital Mining Conference in Cancun, Mexico (The "WDMC") in

- November 2022 (the exact date will not be announced until October), which presents an opportunity for Mrs. Ford to make a significant commission.
6. Mrs. Ford therefore requests that the Court grant her relief from the conditions of pretrial release (Doc. No. 12) to the extent she be allowed to retrieve her passport, renew it, and travel internationally solely for the purpose of attending the WDMC. She would promptly return said passport to U.S. Probation after returning from this trip. In the event the Court or the government had concerns regarding this being an opportunity for Mrs. Ford to flee prior to sentencing, counsel notes that Mrs. Ford would not be attending the event with her husband and/or her three (3) children.
 7. Counsel for Mrs. Ford has consulted with the Government on this matter and Assistant United States Attorney Jessica Perry has no objection to the relief sought herein. Mrs. Ford's probation officer Robert Honstein has indicated he too does not object to her going on this work trip.

WHEREFORE, based on the above and foregoing, Mrs. Ford respectfully requests this Honorable Court enter an order requiring U.S. Probation to temporarily return Mrs. Ford's passport to her, allowing Mrs. Ford to renew said passport, permitting Mrs. Ford to travel to the WDMC in November 2022, and requiring Mrs. Ford to promptly return said passport to U.S. Probation after the conference.

Respectfully submitted,

/s/J. Patrick Quillian

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Counsel for Defendant Jill Ford

CERTIFICATE OF SERVICE

 X I hereby certify that on or before the 23rd day of September, 2022, a copy of the attached document was electronically transmitted to all ECF registrants in the above-referenced matter, namely:

Jessica Perry, Esq., Assistant United States Attorney